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Attorneys for Secured Creditor, NewRez LLC d/b/a Shellpoint Mortgage Servicing, its assignees and/or successors

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA

In re	) Case No. 19-16636-mkn
	)
	) Chapter 11
Censo LLC,	)
	)
Debtor.	) <b>SUPPLEMENT TO OPPOSITION TO</b>
	) <b>DEBTOR’S MOTION TO VALUE</b>
	) <b>COLLATERAL [Dkt 84]</b>
	)
	) <b>Property: 5900 Negril Avenue</b>
	) <b>Las Vegas, NV 89130</b>
	)
	)
	)
	) <b>Hearing:</b>
	) Date: 12/9/2020
	) Time: 9:30 a.m.

1 NewRez LLC d/b/a Shellpoint Mortgage Servicing, its assignees and/or successors,  
 2 (“Respondent”) in the above-entitled Bankruptcy proceeding, hereby submits the following  
 3 Supplement to Response to Motion To Value Collateral [Dkt 84] (“Motion”) proposed by Censo  
 4 LLC (“Debtor”) regarding the real property located at 5900 Negril Avenue, Las Vegas, NV  
 5 89130.

- 6 1. Respondent holds a Promissory Note which is secured by a First Deed of Trust on  
 7 the subject property commonly known as 5900 Negril Avenue, Las Vegas, NV  
 8 89130 (“Subject Property”).
- 9 2. The total amount of Respondent’s secured claim as of July 2020 was  
 10 *approximately* \$517,569.54.
- 11 3. Debtor filed their Motion on 8/20/2020 proposing to value the Subject Property at  
 12 \$363,000.00 and avoid Respondent’s lien, deeming it an unsecured claim of  
 13 \$154,569.54, using an appraisal dated 12/31/2019 - See Dkt.84.
- 14 4. On 10/14/2020, Respondent conducted a full appraisal of the Subject  
 15 Property and determines the current value of the Subject Property to be  
 16 \$404,000.00. See Appraisal dated 10/14/20, and appraiser declaration, attached  
 17 as **Exhibit “1”**.

18 WHEREFORE, Respondent prays as follows:

- 19 1. That Debtor’s Motion To Value Collateral be denied consummate with the above;
- 20 2. For such other relief as this Court deems proper.

21  
 22  
 23 Dated: 11/6/2020

Respectfully submitted,  
 McCarthy & Holthus, LLP

24  
 25 By: /s/ Michael Chen  
 26 Michael Chen, Esq.  
 27 Attorney for Respondent  
 28 NewRez LLC d/b/a Shellpoint  
 29 Mortgage Servicing, its assignees  
 and/or successors